

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

|                                |   |   |
|--------------------------------|---|---|
| <b>VERNA IP HOLDINGS, LLC,</b> | ) |   |
| <b>Plaintiff,</b>              | ) |   |
|                                | ) | <b>Civil Action No. 6:21-cv-00422-ADA</b> |
| <b>v.</b>                      | ) |   |
|                                | ) |   |
| <b>ALERT MEDIA, INC.</b>       | ) | <b>JURY TRIAL DEMANDED</b>                |
| <b>Defendant.</b>              | ) |   |

**OPPOSED MOTION TO DISMISS**

Plaintiff, Verna IP Holdings, LLC (“Verna” or Plaintiff) respectfully files this Opposed Motion to Dismiss for Defendant, Alert Media, Inc. from this lawsuit, without prejudice to refile. Plaintiff has evaluated its case and intends to remove issues in this present case. Plaintiff notified Defendant by phone and e-mail on April 18, 2022, that it intended to dismiss its claims. Defendant is believed not opposed to the dismissal but rather wishes to file a Section 285 motion at the conclusion of the matter. However, Defendant would not agree to an unopposed motion to dismiss.

Dated: May 11, 2022

Respectfully submitted,

/s/ William P. Ramey, III

William P. Ramey, III

Texas Bar No. 24027643

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that May 11, 2022, the foregoing document was served on all counsel of record who have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/William P. Ramey, III  
William P. Ramey, III